

SETTLEMENT DATE AND TIME: June 22, 2015 at 12:00 noon (Eastern time)

OBJECTION DATE AND TIME: June 22, 2015 at 11:30 a.m. (Eastern time)

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*Attorneys for Wilmington Trust Company,
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Motors Liquidation Company GUC Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,**

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF SETTLEMENT OF
ORDER ON MOTION FOR 60(B) RELIEF (DORIS PHILLIPS)**

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York and this Court's June 8, 2015 *Decision on Motion for 60(B) Relief (Doris Phillips)* (ECF No. 13190), the proposed Order of Motion for 60(B) Relief (Doris Phillips) will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New

York 10004 on **June 22, 2015 at 12 noon (Eastern Time).**

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); (ii) Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166-0193 (Attn: Lisa H. Rubin, Esq.); (iii) Goodwin Proctor LLP, The New York Times Building, 620 Eighth Avenue, New York, NY 10018 (Attn: William P. Weintraub); and (iv) Josh Davis Law Firm, 1010 Lamar, Suite 200, Houston, Texas 77002 (Attn: Joshua P. Davis), so as to be received no later than **June 22, 2015, at 11:30 a.m. (Eastern Time).**

Dated: New York, New York
June 17, 2015

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Aric H. Wu
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,
Debtors.**

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

[PROPOSED] ORDER ON MOTION FOR 60(B) RELIEF (DORIS PHILLIPS)

For the reasons stated in this Court's June 8, 2015 *Decision on Motion for 60(B) Relief (Doris Phillips)* (ECF No. 13190) (the "**Decision**"), it is hereby:

ORDERED that *Phillips's First Amended Rule 60(b)(6) Motion for Relief from August 9, 2010 Stipulation and Settlement Resolving Claim No. 44614, or Alternatively, Rule 60(d) Motion to Set Aside* (ECF No. 13090) is denied; and it is further

ORDERED that the Court shall retain exclusive jurisdiction to interpret and enforce this Order and the Decision.

Dated: New York, New York
June __, 2015

The Honorable Robert E. Gerber
United States Bankruptcy Judge